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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 21-cr-20595

v.

Hon. Shalina D. Kumar

LAWRENCE LAVELLE LYON,

Defendant.

FILED
JUN 21 2023
U.S. DISTRICT COURT
FLINT, MICHIGAN

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
Interference With Commerce By Robbery
(18 U.S.C. § 1951)

At all times material to this Indictment, Dollar General was engaged in the selling of various food, beverage, and household products in interstate commerce and was an industry which affects interstate commerce.

On or about July 17, 2021, in the Eastern District of Michigan, Lawrence Lyon, unlawfully obstructed, delayed, and affected, and attempted to obstruct, delay, and affect, commerce as that term is defined in Title 18, United States Code, Section

1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that Lawrence Lyon unlawfully took United States currency from a Dollar General cashier against her will by means of actual and threatened force, violence, and fear of injury.

All in violation of Title 18, United States Code, Section 1951.

COUNT TWO
Using, Carrying, And Brandishing a Firearm During and in Relation to
A Crime of Violence
(18 U.S.C. § 924(c)(1)(A))

On or about July 17, 2021, in the Eastern District of Michigan, Lawrence Lyon knowingly used, carried, and brandished a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery as charged in Count One, all in violation of Title 18, United States Code, Sections 924(c)(1)(A).

COUNT THREE
Felon In Possession Of A Firearm
(18 U.S.C. § 922(g)(1))

On or about July 17, 2021, in the Eastern District of Michigan, Lawrence Lyon, knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a pink and black in color SCCY, model CPx-2, 9mm

semi-automatic handgun, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR
Felon In Possession Of A Firearm
(18 U.S.C. § 922(g)(1))

On or about September 17, 2021, in the Eastern District of Michigan, Lawrence Lyon, knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Glock, model 22, .40 caliber semi-automatic handgun, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Four of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby gives notice to the defendant of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable thereto; all

property involved in, or property traceable to, the violations alleged in this Indictment.

THIS IS A TRUE BILL.

Dated: June 21, 2023

s/ Grand Jury Foreperson

GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ Timothy M. Turkelson

TIMOTHY M. TURKELSON (P53748)
Assistant United States Attorney
101 First Street, Suite 200
Bay City, MI 48708
Telephone number: (989) 895-5712
Timothy.turkelson@usdoj.gov

s/ Anthony P. Vance

ANTHONY P. VANCE (P61148)
Assistant United States Attorney
Chief, Branch Offices

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number: 21-cr-20595
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: TT

Case Title: USA v. Lawrence Lavelle Lyon

County where offense occurred: Genesee

Offense Type: Felony

Indictment -- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: 21-cr-20595 **Judge:** Shalina D. Kumar

Reason:

Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant Name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
Lawrence Lavelle Lyon	18 U.S.C. § 922(g)(1)	21-mj-30375

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

June 21, 2023

Date

s/Timothy M. Turkelson

Timothy M. Turkelson
Assistant United States Attorney
600 Church Street
Flint, MI 48502
timothy.turkelson@usdoj.gov
(810) 766-5177

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.